

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, ROSALIE §  
WEISFELD, AUSTIN JUSTICE §  
COALITION, COALITION OF TEXANS §  
WITH DISABILITIES, MOVE TEXAS §  
CIVIC FUND, LEAGUE OF WOMEN §  
VOTERS OF TEXAS, and AMERICAN GI §  
FORUM OF TEXAS, INC., §  
§  
§

*Plaintiffs*

v.

Civil Case No. 5:19-cv-00963-OG

TEXAS SECRETARY OF STATE, TRUDY §  
HANCOCK, in her official capacity as §  
BRAZOS COUNTY ELECTIONS §  
ADMINISTRATOR, and PERLA LARA in §  
her official capacity as CITY OF §  
MCALLEN, TEXAS SECRETARY, §  
§  
§

*Defendants.*

**SECOND SUPPLEMENTAL APPENDIX**

**TABLE OF CONTENTS**

82. 2018 Texas EAC Data .....	4
83. 2016 Texas EAC Data .....	7
84. Public Information Act Request dated June 15, 2019.....	10
85. Email Correspondence regarding Public Information Action Request.....	12
86. League of Women Voters of Texas 30(b)(6) Deposition Transcript Excerpts .....	17
87. Internal Email Correspondence from MOVE Texas .....	31
88. Internal Email Correspondence from MOVE Texas .....	35
89. Social Media Post from Coalition of Texans with Disabilities.....	37

Dated: July 13, 2020

Respectfully submitted,

/s/ Hani Mirza

**TEXAS CIVIL RIGHTS PROJECT**

Mimi M.D. Marziani  
Texas Bar No. 24091906  
[mimi@texascivilrightsproject.org](mailto:mimi@texascivilrightsproject.org)  
Hani Mirza  
Texas Bar No. 24083512  
[hani@texascivilrightsproject.org](mailto:hani@texascivilrightsproject.org)  
Ryan V. Cox  
Texas Bar No. 24074087  
[ryan@texascivilrightsproject.org](mailto:ryan@texascivilrightsproject.org)  
Zachary D. Dolling  
Texas Bar No. 24105809  
[zachary@texascivilrightsproject.org](mailto:zachary@texascivilrightsproject.org)

1405 Montopolis Drive  
Austin, Texas 78741  
512-474-5073 (Telephone)  
512-474-0726 (Facsimile)

**WILLKIE FARR & GALLAGHER LLP**

Richard Mancino (NY Bar No. 1852797)  
Samuel Kalar (NY Bar No. 5360995)  
JoAnna Suriani (NY Bar No. 5706395)

787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111  
Email: [rmancino@willkie.com](mailto:rmancino@willkie.com)  
[skalar@willkie.com](mailto:skalar@willkie.com)  
[jsuriani@willkie.com](mailto:jsuriani@willkie.com)

-AND-

Jennifer J. Hardy (TX Bar No. 24096068)  
Denis A. Fallon (TX Bar No. 24059731)  
Garrett Johnston (TX Bar No. 24087812)  
Audra White (TX Bar No. 24098608)

600 Travis Street, Suite 2100  
Houston, Texas 77002  
Telephone: (713) 510-1700  
Facsimile: (713) 510-1799  
Email: [jhardy2@willkie.com](mailto:jhardy2@willkie.com)

afallon@willkie.com  
gjohnston@willkie.com  
awhite@willkie.com

***COUNSEL FOR PLAINTIFFS***

**CERTIFICATE OF SERVICE**

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on July 13, 2020 through the Electronic Case File System of the Western District of Texas.

/s/ Hani Mirza \_\_\_\_\_

# Exhibit 82

# **Document Produced in Native Format**

## **Document Mailed to Court on Hard Drive**

# Exhibit 83

## **Document Produced in Native Format**

## **Document Mailed to Court on Hard Drive**

# Exhibit 84



1412 Main St. #608  
Dallas, TX 75202  
972.333.9200(p) 972.957.7867(f)  
[texascivilrightsproject.org](http://texascivilrightsproject.org)

June 25, 2019

Public Information Officer  
Secretary of State  
Elections Division  
P.O. Box 12060  
Austin, TX 78711-2060  
[elections@sos.texas.gov](mailto:elections@sos.texas.gov)

via: email

To the Public Information Officer,

Several sections of the Help America Vote Act require the Texas Secretary of State (SOS) to provide voter registration and election related data on a biennial basis to the U.S. Election Assistance Commission (EAC). Pursuant to section 552.221 of the Texas Government Code, we respectfully request one copy of the following:

1. A copy of all materials submitted by the SOS to the EAC in 2017 covering the previous two years.
2. A copy of all materials submitted by the SOS to the EAC in 2015 covering the previous two years.
3. A copy of all materials submitted by the SOS to the EAC in 2013 covering the previous two years.

Responsive documents may be sent to me by email to [chris@texascivilrightsproject.org](mailto:chris@texascivilrightsproject.org).

We make this request for nonprofit purposes and to serve the public interest. The information requested will be used without charge, including for the purpose of informing others in improving civil society. We are a nonprofit, tax-exempt organization, and those whom we assist and represent are low-income people. Therefore, we respectfully request, pursuant to Government Code, section 552.267, that fees are waived. If you choose not to waive fees and the cost of copying exceeds \$25, please advise us of the actual costs before producing copies.

Thank you for your time and assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Chris Rainbolt". The signature is fluid and cursive, with "Chris" on top and "Rainbolt" below it, both in a similar script.

Chris Rainbolt  
Texas Civil Rights Project  
972-333-9200 ext. 170  
[chris@texascivilrightsproject.org](mailto:chris@texascivilrightsproject.org)

# Exhibit 85



Chris Rainbolt <chris@texascivilrightsproject.org>

**RE: PIA Request - SOS - Previous EAVS Data**

1 message

Brenda Hester <BHester@sos.texas.gov>  
To: Chris Rainbolt <chris@texascivilrightsproject.org>  
Cc: Lillian Eder <LEder@sos.texas.gov>, Kristi Hart <KHart@sos.texas.gov>

Wed, Jul 3, 2019 at 1:34 PM

Good afternoon Mr. Rainbolt:

Attached is the 2012 EAVS survey per your request. Should you need further assistance, please let me know. Thanks, Brenda

Brenda Hester  
TEAM Program Specialist, Voter Registration  
The Office of the Secretary of State  
(o) 800-252-8683 Opt. 1  
(f) 512-475-2811  
[bhester@sos.texas.gov](mailto:bhester@sos.texas.gov)  
<http://www.sos.state.tx.us/>  
<http://votetexas.gov/>



---

**From:** Chris Rainbolt <chris@texascivilrightsproject.org>  
**Sent:** Wednesday, July 3, 2019 12:49 PM  
**To:** Brenda Hester <BHester@sos.texas.gov>  
**Cc:** Lillian Eder <LEder@sos.texas.gov>; Kristi Hart <KHart@sos.texas.gov>  
**Subject:** Re: PIA Request - SOS - Previous EAVS Data

**CAUTION:** This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to [Informationsecurity@sos.texas.gov](mailto:Informationsecurity@sos.texas.gov).

Ms. Hester,

Thank you for clarifying. I didn't realize the "All Counties" file was the 2016 EAVS report.

Unfortunately, there is still missing information that was requested. To clarify an apparent miscommunication between the documents produced and my request, my request referred to when the data was submitted to the EAC. For example, I requested data submitted to the EAC in 2017. This refers to the data for the 2016 election which you have provided and refer to as "2016 EAVS listed as all counties." So on one end, you provided 2018 EAVS which was not requested and have not provided the 2012 EAVS which was submitted in 2013.

Please send the last requested report.

Thank you.

**Chris Rainbolt**

*Paralegal/Office Manager*

Texas Civil Rights Project

O: 972-333-9200 ext.170

F: 972-957-7867

[www.texascivilrightsproject.org](http://www.texascivilrightsproject.org)

[Facebook](#) | [Twitter](#) | [Instagram](#)

Donate Now!

This email and any files attached are privileged and confidential, and is/are intended only for the individual named. If you are not the intended recipient or otherwise have reason to believe that you have received this message in error, please notify the sender by email and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this message and any attachments is strictly prohibited.

On Tue, Jul 2, 2019 at 8:13 AM Brenda Hester <[BHester@sos.texas.gov](mailto:BHester@sos.texas.gov)> wrote:

Good morning Mr. Rainbolt:

The files we provided were for your request:

2018 EAVS – you requested 2017

2016 EAVS listed as all counties – you requested 2015

2014 EAVS – you requested 2013

If there is something else you need, please let us know. Thanks, Brenda

Brenda Hester

TEAM Program Specialist, Voter Registration

The Office of the Secretary of State

(o) 800-252-8683 Opt. 1

(f) 512-475-2811

[bhester@sos.texas.gov](mailto:bhester@sos.texas.gov)

<http://www.sos.state.tx.us/>

<http://votetexas.gov/>



---

**From:** Chris Rainbolt <[cchris@texascivilrightsproject.org](mailto:cchris@texascivilrightsproject.org)>

**Sent:** Monday, July 1, 2019 5:45 PM

**To:** Brenda Hester <[BHester@sos.texas.gov](mailto:BHester@sos.texas.gov)>

**Cc:** Lillian Eder <[LEder@sos.texas.gov](mailto:LEder@sos.texas.gov)>; Kristi Hart <[KHart@sos.texas.gov](mailto:KHart@sos.texas.gov)>; Elections Internet <[Elections@sos.texas.gov](mailto:Elections@sos.texas.gov)>

**Subject:** Re: PIA Request - SOS - Previous EAVS Data

**CAUTION:** This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to [Informationsecurity@sos.texas.gov](mailto:Informationsecurity@sos.texas.gov).

Ms. Hester,

Thank you for providing these documents. The response, however, appears incomplete.

We requested all data submitted to the EAC in 2017, 2015, and 2013. You sent data that appears to have been submitted in 2019 and 2015 only.

I don't see any data submitted in 2017 covering the previous two years or in 2013 covering the previous two years.

Please send the data submitted for all requested periods.

Let me know if you have any questions.

Thank you.

**Chris Rainbolt**

*Paralegal/Office Manager*

Texas Civil Rights Project

O: 972-333-9200 ext.170

F: 972-957-7867

[www.texascivilrightsproject.org](http://www.texascivilrightsproject.org)

[Facebook](#) | [Twitter](#) | [Instagram](#)

[Donate Now!](#)

This email and any files attached are privileged and confidential, and is/are intended only for the individual named. If you are not the intended recipient or otherwise have reason to believe that you have received this message in error, please notify the sender by email and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this message and any attachments is strictly prohibited.

On Mon, Jul 1, 2019 at 2:14 PM Brenda Hester <[BHester@sos.texas.gov](mailto:BHester@sos.texas.gov)> wrote:

Good afternoon Mr. Rainbolt:

Per your PIR request attached, are the attached EAC survey's you requested. Pursuant to Government Code Section 552.267 the fees will be waived for this request. Thank you, Brenda

Brenda Hester

TEAM Program Specialist, Voter Registration

The Office of the Secretary of State

(o) 800-252-8683 Opt. 1

(f) 512-475-2811

[bhester@sos.texas.gov](mailto:bhester@sos.texas.gov)

<http://www.sos.state.tx.us/>

<http://votetexas.gov/>



---

**From:** Chris Rainbolt <[chris@texascivilrightsproject.org](mailto:chris@texascivilrightsproject.org)>

**Sent:** Tuesday, June 25, 2019 5:38 PM

**To:** Elections Internet <[Elections@sos.texas.gov](mailto:Elections@sos.texas.gov)>

**Subject:** PIA Request - SoS - Previous EA VS Data

**CAUTION:** This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to [Informationsecurity@sos.texas.gov](mailto:Informationsecurity@sos.texas.gov).

To the Officer for Public Information,

Please find the attached request for public information.

Thank you.

**Chris Rainbolt**

*Paralegal/Office Manager*

Texas Civil Rights Project

O: 972-333-9200 ext.170

F: 972-957-7867

[www.texascivilrightsproject.org](http://www.texascivilrightsproject.org)

[Facebook](#) | [Twitter](#) | [Instagram](#)

[Donate Now!](#)

This email and any files attached are privileged and confidential, and is/are intended only for the individual named. If you are not the intended recipient or otherwise have reason to believe that you have received this message in error, please notify the sender by email and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this message and any attachments is strictly prohibited.

---

**2 attachments**

 [2012\\_EAVS\\_1of2.pdf](#)  
2200K

 [2012\\_EAVS\\_2of2.pdf](#)  
608K

# Exhibit 86

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, \*  
ROSALIE WEISFELD, AUSTIN \*  
JUSTICE COALITION, \*  
COALITION OF TEXANS WITH \*  
DISABILITIES, MOVE TEXAS \*  
CIVIC FUND, LEAGUE OF \*  
WOMEN VOTERS OF TEXAS, \*  
and AMERICAN GI FORUM OF \*  
TEXAS, INC., \*

Plaintiffs, \*

VS. \*

TEXAS SECRETARY OF \*  
STATE, TRUDY HANCOCK, IN \*  
HER OFFICIAL CAPACITY AS \*  
BRAZOS COUNTY ELECTIONS \*  
ADMINISTRATOR, AND PERLA \*  
LARA IN HER OFFICIAL \*  
CAPACITY AS CITY OF \*  
MCALLEN, TEXAS \*

SECRETARY, \*

CIVIL ACTION NUMBER  
5:19-cv-0963

Defendants. \*

Remote Oral Deposition of  
League of Women Voters of Texas,  
By and through their Designated Representative,

GRACE CHIMENE

May 18, 2020

10:08 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

1                   REMOTE ORAL DEPOSITION OF LEAGUE OF WOMEN  
2 VOTERS OF TEXAS, BY AND THROUGH THEIR DESIGNATED  
3 REPRESENTATIVE, GRACE CHIMENE, produced at the  
4 instance of the Defendant, Texas Secretary of State,  
5 in the above-styled and numbered cause on the  
6 18th day of May, 2020, at 10:08 a.m., before Micheal  
7 A. Johnson, RDR, CRR, Notary Public in and for the  
8 State of Texas, reported by realtime stenographic  
9 means, at the location of the witness, Austin,  
10 Texas, pursuant to Notice of Oral Deposition, and in  
11 accordance with the Federal Rules of Civil  
12 Procedure.

13

14

15

16

17

18

19

20

21

22

23

24

25

1 REMOTE APPEARANCES

2 ON BEHALF OF THE PLAINTIFFS:

3 JoAnna Suriani  
4 WILLKIE FARR & GALLAGHER LLP  
1875 K Street, N.W.  
5 Washington, D.C. 20006-1238  
(202) 303-1193  
jsuriani@willkie.com

6 Samuel Kalar  
7 WILLKIE FARR & GALLAGHER LLP  
787 Seventh Avenue  
8 New York, New York 10019-6099  
(212) 728-8724  
skalar@willkie.com

10 Zachary Dolling  
Hani Mirza  
11 Ryan Cox  
12 TEXAS CIVIL RIGHTS PROJECT  
1405 Montopolis Drive  
Austin, Texas 78741  
13 (512) 474-5073  
zachary@texascivilrightsproject.org  
14 hani@texascivilrightsproject.org  
ryan@texascivilrightsproject.org

15  
16 ON BEHALF OF THE DEFENDANT  
TEXAS SECRETARY OF STATE:

17 Anne Marie Mackin  
18 ASSISTANT ATTORNEY GENERAL  
Post Office Box 12548  
19 Austin, Texas 78711-2548  
(512) 463-2798  
20 anna.mackin@oag.texas.gov

21

22

23

24

25

1 REMOTE APPEARANCES (CONT.)

2 ON BEHALF OF THE DEFENDANT  
3 TRUDY HANCOCK IN HER OFFICIAL CAPACITY AS BRAZOS  
COUNTY ELECTIONS ADMINISTRATOR:

4 J. Eric Magee  
5 ALLISON, BASS & MAGEE, LLP  
6 402 West 12th Street  
Austin, Texas 78701  
(512) 482-0701  
e.magee@allison-bass.com

7 Bruce L. Erratt  
8 BRAZOS COUNTY ATTORNEY'S OFFICE  
9 300 East 26th Street, Suite 1300  
Bryan, Texas 77803  
(979) 775-7400  
10 berratt@brazoscountytexas.gov

11 ON BEHALF OF THE DEFENDANT  
12 PERLA LARA IN HER OFFICIAL CAPACITY AS CITY OF  
McALLEN, TEXAS SECRETARY:

13 Isaac J. Tawil  
14 Austin Stevenson  
CITY OF McALLEN  
15 1300 West Houston Avenue  
McAllen, Texas 78501-5002  
16 (956) 681-1090  
itawil@mcallen.net  
17 astevenson@mcallen.net

18 ALSO PRESENT:

19 Brian Christopher, Video Technician

20

21

22

23

24

25

1	INDEX	
2	GRACE CHIMENE	
3	May 18, 2020	
4		
5	REMOTE APPEARANCES	3
6		
7	PROCEEDINGS	8
8		
9	EXAMINATION OF GRACE CHIMENE:	
10		
11	BY MS. MACKIN	8
12	BY MR. TAWIL	88
13	BY MR. MAGEE	94
14	BY MS. SURIANI	107
15	BY MS. MACKIN	110
16		
17		
18	CORRECTIONS AND SIGNATURE	118
19		
20	REPORTER'S CERTIFICATION	119
21		
22		
23		
24		
25		

1 DEPOSITION EXHIBITS  
2 GRACE CHIMENE  
3 May 18, 2020

NUMBER	DESCRIPTION	MARKED
Exhibit 1	Defendant Secretary of State's First Amended Notice of Oral Deposition Pursuant to Federal Rule of Civil Procedure 30	11
Exhibit 2	Plaintiffs' Original Complaint	20
Exhibit 3	League of Women Voters of Texas Education Fund (TEF) Proposed Budget for 2016-2018 LWV-00000575	37
Exhibit 4	Explanation of Proposed Budgets for 2016-2018 Excerpts from 2016 Convention Workbook LWV-00000020 - LWV-00000022	47
Exhibit 5	Explanation of Proposed Budgets LWV-00000068 - LWV-00000069	65
Exhibit 6	Explanation of Proposed Budgets LWV-00000240 - LWV-00000241	66
Exhibit 7	Explanation of Proposed Budget for 2020-2022 LWV-00000151 - LWV-00000153	68

1 DEPOSITION EXHIBITS  
2 GRACE CHIMENE  
3 May 18, 2020

NUMBER	DESCRIPTION	MARKED
Exhibit 8	PowerPoint, LWV, Empowering voters Defending democracy, Get in the Game LWV-00000272 - LWV-00000295	71
Exhibit 9	PowerPoint, LWV Empowering voters Defending democracy, Vote by Mail LWV-00000344 - LWV-00000367	71
Exhibit 10	Excel Spreadsheet LWV-00000701	82
Exhibit 12	Facebook Screenshot LWV-00000702	110
Exhibit 13	Facebook Screenshot LWV-00000703	113
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 PROCEEDINGS

2 GRACE CHIMENE,

3 called as a witness, having been duly sworn by a  
4 Notary Public, was examined and testified as  
5 follows:

6 EXAMINATION

7 BY MS. MACKIN:

8 Q. Good morning, my name is Anna Mackin.

9 I'm an attorney with the Texas Office of the  
10 Attorney General and I represent the defendant, the  
11 Texas Secretary of State, in this lawsuit. I'm  
12 going to be taking your deposition today.

13 Would you please speak and spell your  
14 name for the record.

15 A. Grace Chimene, G-r-a-c-e C-h-i-m-e-n-e.

16 Q. And, Ms. Chimene, I understand that you  
17 have been deposed before; is that correct?

18 A. Yes.

19 Q. How many times?

20 A. Once.

21 Q. And was it also a virtual deposition,  
22 just like this one today?

23 A. Yes, it was. Yes. But I had an office  
24 and now I don't have an office.

25 Q. Well, thank you for your time today.

1           A.       I would presume all of our members, which  
2 is somewhere around -- it goes up and down, but  
3 somewhere around 3,000.

4 BY MS. MACKIN:

5 Q. Do you know if any of those league  
6 members have ever had a mail-in ballot rejected  
7 based on a signature mismatch?

8 A. No, I don't know.

9 Q. I'm going to share a document with you  
10 that was produced to us this morning and it's  
11 actually an Excel file. And please let me know when  
12 you're able to pull up that document.

13 A. What number is it?

14 Q. It -- the title of the Excel file is  
15 LWV-00000701.

A. I don't see it.

17 MS. SURIANI: And I don't think it's  
18 in --

19 BY MS. MACKIN:

20 Q. I accidentally didn't send it. User  
21 error. All right. Let me know if that works.

22 THE WITNESS: Do y'all see it? Oh,  
23 there it is down there at the bottom.

24 A. Okay. It's up.

(Deposition Exhibit 10 marked for identification.)

3 | BY MS. MACKIN:

4 Q. Do you recognize this Excel file?

5 A. Yes.

6 Q. What is it?

7           A.       It is the -- it is the report spreadsheet  
8 from a survey we sent out on Friday to our league  
9 members.

10 Q. And Friday would have been May 15th,  
11 2020?

12 A. 15, yes. And we sent it out in the  
13 afternoon on the 15th.

Q. And what questions did the survey ask?

15 A. Can I open it and --

Q.      Absolutely.   Yes.   Yes.

17 A. I'm going to make it be a wrap so I  
18 can -- a wrap text so I can see it. I can't do it.

19                   Okay. It says, have you voted by mail in  
20 the past and are you planning on voting by mail in  
21 the future. That was the first question. And the  
22 answers available were yes and no.

23                   And then it says, are you planning on  
24 voting by mail in the future? And the answers --  
25 possible answers were yes and no.

1           And then it was, if you answered yes to  
2 either of the questions above, under what category  
3 were you eligible to vote by mail in the next  
4 election? And then it had the eligibility  
5 categories for vote by mail.

6           And then I had -- we had people say which  
7 league they were with.

8       Q.     Okay. Did the survey collect any other  
9 information?

10      A.     No.

11      Q.     So it didn't -- it didn't collect the  
12 names of any respondents?

13      A.     No. No, ma'am.

14      Q.     And how -- how was it -- how was this  
15 survey prepared? Was it Google Forms or Survey  
16 Monkey?

17      A.     Google Forms.

18      Q.     And you may have said this, but I don't  
19 recall. Who was it sent out to?

20      A.     It was sent out to the member list.

21      Q.     Of the League of Women Voters of Texas?

22      A.     Texas, uh-huh.

23      Q.     And the first column shows a time stamp,  
24 looks like a date and a time.

25      A.     Uh-huh.

1       A.     Yeah. This is a really important issue  
2 to our members. Our members tend to be older. They  
3 care a lot about voting in elections and I think  
4 within the first -- you can look down here. Within  
5 the first hour we had already gotten 100 answers, so  
6 I was pretty proud of the league members.

7       Q.     It is a very robust response.

8       A.     Yeah.

9       Q.     And prompt. Do you know, then, if any of  
10 the individuals who responded to this survey have  
11 ever had their mail-in ballot rejected because of  
12 signature mismatch?

13      A.     I did not --

14                  MS. SURIANI: Objection to form.

15 Sorry.

16                  Grace, you can answer.

17      A.     I don't know and I did not read all the  
18 responses. I'm looking at them now.

19                  (Witness reviews document.)

20      A.     Okay. I don't see anything in there.

21 BY MS. MACKIN:

22      Q.     Okay. There were also a few e-mails  
23 produced to us and I think I might be able to make  
24 this go a little bit more quickly if the answer is  
25 the same for all of them, but I'm happy to pull up

119

1 REPORTER'S CERTIFICATION  
2

3 I, Micheal A. Johnson, Registered Diplomate  
4 Reporter, Certified Realtime Reporter and Notary  
5 Public in and for the State of Texas, certify that  
6 on the 18th day of May, 2020, I reported the Remote  
7 Oral Deposition of GRACE CHIMENE, after the witness  
8 had first been duly cautioned and sworn to testify  
9 under oath; said deposition was subsequently  
10 transcribed by me and under my supervision and  
11 contains a full, true and complete transcription of  
12 the proceedings had at said time and place; and that  
13 reading and signing was requested.

14 I further certify that I am neither counsel  
15 for nor related to any party in this cause and am  
16 not financially interested in its outcome.

17 GIVEN UNDER MY HAND AND SEAL of office on  
18 this 29th day of May, 2020.

19

20



21

22 MICHEAL A. JOHNSON RDR, CRR  
23 NCRA Registered Diplomate Reporter  
NCRA Certified Realtime Reporter  
Notary Public in and for the  
State of Texas  
My Commission Expires: 8/8/2020  
24

25

# Exhibit 87



From: **Raven Douglas** raven@movetexas.org  
Subject: PLEASE READ: Updates about COVID-19  
Date: March 20, 2020 at 3:59 PM  
To: Drew Galloway drew@movetexas.org, Charlie Bonner charlie@movetexas.org  
Bcc: erica@movetexas.org

Hi MOVE fam,

Thank you for patience and flexibility during this week. I know these are unprecedented times and we appreciate you all being team players. I am emailing to update everyone to provide organizational updates as it pertains to Coronavirus.

**Please read this email in its entirety as there is a lot of pertinent information.**

#### **Work From Home Policy**

**For the safety of our team, we have made the decision to extend our remote working policy to Friday, May 1.** As we continue to see more campuses close for the semester, states moving to complete lockdowns and the pandemic spread, your health and wellbeing is of the utmost importance. During this time, MOVE HQ will continue to be closed and all field shifts have been cancelled for the remainder of the semester.

The CDC now recommends that folks don't attend gatherings larger than 10 people. We continue to ask that non-essential meetings (determined by your supervisor) take place via video conference and that you not attend events with more than 10 people.

**In light of these new guidelines, we have made the decision to cancel graduation on Saturday, May 2.** The Leadership Development team will reach out to fellows and interns to get your address so that we can make sure you get your alumni hat and certificate.

**For those who wish to remain in the Civic Leadership Program, we are committing to paying and supporting you through the end of the semester.** If you are a fellow or intern and you need to reduce your hours or leave the program for any reason, please contact your supervisor and Cecilia. We understand things are unpredictable at this time which may impact your fellowship or internship.

#### **Summer 2020 Civic Leadership Program**

We anticipate social distancing measures to increase in the upcoming weeks and medical experts are estimating that this pandemic can last until possibly July or August. University officials we have spoken to have indicated the likelihood of campuses opening over the summer to be very low. **After much thought and consideration, we have decided to not host a Civic Leadership Program for the Summer 2020 semester.**

This is a heartbreakin decision for each of us as the Civic Leadership Program is at the core of MOVE Texas' work. At this time, we cannot provide the hands-on trainings or field experience needed to adequately serve the Civic Leadership Program class next semester.

We will still have ways for you to volunteer with us over the summer, including advocacy, digital, and communications. If the opportunity to return to the field over the summer arises, we plan to hire part-time paid youth canvassers: **Civic Leadership Program alumni will be given special priority for these paid, hourly positions.**

Additionally, we have made the decision that the Spring 2020 semester will not have any impact on the two-semester term limit. We highly encourage all current fellows and interns to apply for the Fall 2020 semester once the application becomes available.

### **Paid Time Off Requests (Staff Only)**

I know most of us had planned post-primary/summer vacations that have now been impacted by the Coronavirus. If you would like to cancel or amend your PTO request please email your supervisor and CC Jamilyn.

### **Online Voter Registration Tools**

We will be working with Register2Vote.org next week to build out a page on our website that allows young Texans to register to vote “online.” People who complete our form online will be mailed their completed voter registration application where then they will have to sign it and mail it back in. This is the closest we can get to online voter registration at this time and doesn’t require a prospective voter to print out their form. Additionally, postage is already included.

Once this page is up it will allow us to conduct class raps in online classes and use tools like OutVote to connect with young people across the state. Additionally, Charlie is working to create a video that can be sent to professors and shared on social media on how to use our register 2 vote link. We have a unique, MOVE Texas Register2Vote link that your supervisor will share with you next week. Using our unique link allows us to track how many people complete the application, follow up with the voter to ensure their application is mailed, and determine when the registration application arrives at the elections department.

### **Protecting our Democracy During a Pandemic**

We recognize that advocacy and organizing work is vital now more than ever. Coronavirus is impacting not only our schools and jobs, but also our elections. We are launching a new “Protecting our Democracy During a Pandemic” campaign which advocates for the following three measures:

- Online Voter Registration
- Vote-by-mail
- Non-postponement of the November election

The Communications and Advocacy Departments are working together to launch a microsite and petition which will be accessible on our website. More information will be

coming over the next two weeks related to this campaign.

### Moving Forward

**This guidance is subject to change.** We'll make sure to give you plenty of notice if there are any changes. As things evolve, we'll be passing around updated resources and best practices every week. Drew, Charlie, and I will continue to be our organization's point for being alerted with guidance and measures taken by the state health department, CDC, and the World Health Organization.

Let me know if you have any questions on this thread. Chances are if you have a question,

someone has a similar one. Thank you for patience, flexibility, and understanding during this time. Continue to take care of yourself, your family, and your team.

Thanks everyone,

Raven, Drew and Charlie

**Raven Douglas** (she/her/hers)

Political Director | MOVE Texas

1023 N Pine St, San Antonio, TX 78202

raven@movetexas.org | (281) 827-9687



Help Us Help Democracy: Donate Today!

Follow Us: Facebook | Twitter | Instagram

# Exhibit 88



John Wingert &lt;john@movetexas.org&gt;

---

## (TEXT VERSION): Innovating to meet the challenge

---

H. Drew Galloway <drew@movetexas.org>  
Reply-To: john@movetexas.org  
To: John Wingert <john@movetexas.org>

Fri, Apr 3, 2020 at 10:28 AM

Dear John ,

I hope this note finds you and your family well. We join many around the world in closely following developments on the spread of COVID-19 and are sending our thoughts to those affected and the brave healthcare workers on the front line of this pandemic.

The recommended need for social distancing led MOVE Texas to make the difficult decision to temporarily halt all in-person field organizing and voter registration efforts for the health and safety of our organizers and our community. That said, our work will not stop.

When campuses closed, MOVE quickly pivoted to a digital organizing model and launched a new program to keep young people engaged in this time of self-isolation. MOVE University, tagged “social justice for social distancing,” seeks to engage our communities in live conversations on topics like the census, voting rights, LGBTQIA+ rights, and Paid Sick Time from the comfort of their living rooms. To continue building upon this year’s voter registration efforts, we’ve implemented new tools to allow our organizers to register and engage voters online.

Our work not only continues, but it is more important than ever. The issues MOVE has championed for years, like paid sick time, online voter registration, and vote by mail could not be more relevant. As COVID-19 illuminates the inequities in our system, the MOVE Texas team is doubling down on our advocacy efforts to protect the most vulnerable.

None of this work would be possible without your generous support. Thank you.

Stay safe out there, wash your hands, and take the downtime at home to make sure your friends and neighbors are registered to vote at their current address .

Sincerely,

H. Drew Galloway,  
Executive Director  
MOVE Texas

MOVE Texas  
1023 North Pine Street  
San Antonio, TX 78202  
United States

If you believe you received this message in error or wish to no longer receive email from us, please (Unsubscribing is not supported in previews).

# Exhibit 89



**Coalition of Texans with Disabilities is on Facebook. To connect with  
Coalition of Texans with Disabilities, log into Facebook.**

[REDACTED]  
Log In

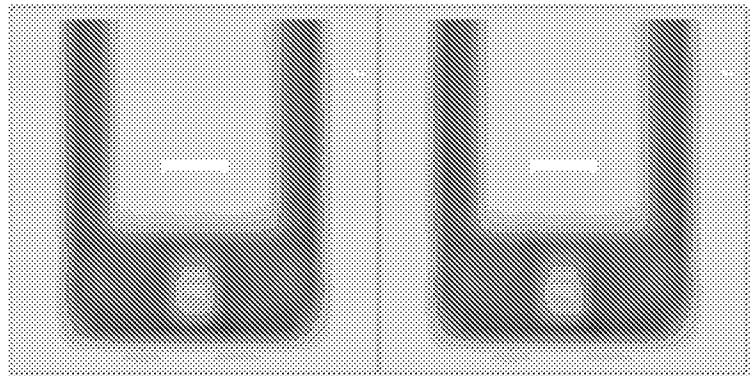
or

[REDACTED]  
Create Account

### Coalition of Texans with Disabilities

Happy Independence Day! Exercise your freedom by registering to vote, learn how here: <https://www.votetexas.gov/register-to-vote/index.html>

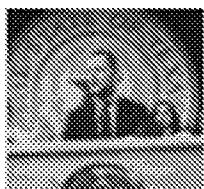
Pro tip: Signature discrepancies may cause your vote to go uncounted! Make sure the signature on your mail in ballot is as close as possible to the to the signature on your voter registration form.



July 4 at 3:37 PM · Public



Pages Liked by Page



Rafael Anchia

7K likes this

Rafael Anchia was elected in November 2004 as the representative of House District 103 in the Texas...